

Exhibit A

Bromberg Law Office, P.C.

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Christopher Godson**Date:** 9/21/2018**File Number:** /**Re:** Godson v. Eltman, Eltman & Cooper, P.C.**Invoice Number:** 11054

<u>Date</u>	<u>Initials</u>	<u>Description of Service</u>	<u>Hours</u>	<u>Amount</u>
08/02/2011	BLB	Analysis and review of letter received from Seth Andrews	0.50	275.00
09/08/2011	BLB	Analysis and review of draft complaint from co-counsel	0.50	275.00
09/09/2011	BLB	Email correspondence with Ken Hiller about draft complaint	0.10	55.00
09/18/2011	BLB	Preparation and filing of Notice of Appearance	0.30	165.00
09/19/2011	BLB	Read and reviewed email from Ken Hiller's paralegal; responded to email	0.20	110.00
11/14/2011	BLB	Email correspondence with Ken Hiller re defense counsel's request for an extension to answer	0.10	55.00
12/12/2011	BLB	Read and reviewed email correspondence from Pushpa Piyatissa, Esq.	0.10	55.00
12/12/2011	BLB	Email correspondence with co-counsel re email from Pushpa	0.10	55.00
12/12/2011	BLB	Analysis and review of answer to complaint	0.50	275.00
12/12/2011	BLB	Email correspondence with co-counsel re frivolous affirmative defenses -- decided to move to strike them	0.30	165.00
01/02/2012	BLB	Read and review first draft of motion to strike affirmative defenses	0.20	110.00
01/03/2012	BLB	Preparation of revised motion to strike affirmative defenses	1.50	825.00
01/04/2012	BLB	Telephone call to Kenneth R Hiller - spoke - re Rule 16 and Rule 26 conferences, as well as ADR procedures	0.20	110.00
01/06/2012	BLB	Read and reviewed proposed CMO from Ken Hiller	0.20	110.00
02/16/2012	BLB	Telephone call w/ Ken Hiller re next steps; email to defense counsel to schedule telephone conference to select mediator	0.20	110.00
02/16/2012	MNL	Analysis and review of of Plaintiff's motion to strike and accompanying memorandum and Defendants' opposition in preparation for drafting of reply brief	0.40	160.00
02/17/2012	MNL	Preparation of reply brief in further support of motion to strike affirmative defenses; ecf brief	2.00	800.00
02/17/2012	BLB	Read and reviewed proposed Rule 26(a) disclosures from Ken Hiller	0.30	165.00
02/17/2012	BLB	Email correspondence with Pushpa re mediation	0.20	110.00
02/17/2012	BLB	Email correspondence with Pushpa re scheduling a call	0.10	55.00
02/17/2012	BLB	Email correspondence with all counsel re Hugh Russ as mediator	0.20	110.00
03/22/2012	MNL	Preparation of motion for class cert and accompanying documents	4.60	1,840.00
03/23/2012	MNL	Preparation of motion for class certification and accompanying documents, including BB declaration.	3.70	1,480.00

03/23/2012	BLB	Preparation of motion for class certification and supporting documents	2.00	1,100.00
03/27/2012	MNL	Preparation and filing of motion for class certification and accompanying documents	2.10	840.00
03/27/2012	BLB	Preparation of motion for class certification and supporting documents	2.00	1,100.00
03/28/2012	BLB	Read and reviewed mediation memorandum from Seth Andrews	0.50	275.00
03/28/2012	BLB	Read and reviewed documents from client	0.50	275.00
03/28/2012	BLB	Email correspondence with co-counsel re documents from client	0.50	275.00
03/28/2012	BLB	Telephone call w/ client and Seth Andrews in preparation for Friday's mediation	1.00	550.00
03/29/2012	BLB	Email correspondence with Seth Andrews re proceedings in Florida	0.20	110.00
03/30/2012	BLB	Attend meeting in Buffalo for mediation	8.00	4,400.00
04/06/2012	BLB	Multiple email correspondence with co-counsel re letter to Judge Schroeder	0.40	220.00
05/01/2012	BLB	Read and reviewed email from Connie Montoya re informal discovery; email in response	0.20	110.00
05/17/2012	BLB	Mediation prep with client for follow-up session	1.00	550.00
05/18/2012	BLB	Attend meeting in Buffalo for mediation	8.00	4,400.00
05/22/2012	BLB	Email correspondence with co-counsel re settlement offer from Defendants	0.40	220.00
06/07/2012	BLB	Read and reviewed email from Hugh Russ	0.10	55.00
06/12/2012	MNL	Preparation of initial written discovery requests	2.40	960.00
06/12/2012	BLB	Preparation of initial written discovery demands	2.10	1,155.00
06/13/2012	BLB	Telephone call w/ Seth Andrews re issues concerning First Set of Written Discovery Demands	0.20	110.00
06/13/2012	BLB	Final preparation of First Set of Written Discovery Demands	0.50	275.00
07/03/2012	BLB	Read and reviewed email from Connie Montoya	0.10	55.00
07/03/2012	BLB	Email correspondence with Connie Montoya re discovery	0.50	275.00
07/05/2012	BLB	Telephone call w/ Seth Andrews re Plaintiff's deposition	0.20	110.00
07/05/2012	BLB	Read and reviewed email correspondence from Connie Montoya re deposition of Plaintiff	0.10	55.00
07/05/2012	BLB	Email correspondence with co-counsel re Plaintiff's deposition	0.10	55.00
07/06/2012	BLB	Correspondence with Magistrate Judge Schroeder in response to Connie Montoya's letter-motion	0.60	330.00
07/09/2012	BLB	Telephone call -- deposition preparation of client with Seth Andrews	2.00	1,100.00
07/09/2012	BLB	Email correspondence with co-counsel re discovery	0.20	110.00
07/17/2012	BLB	Travel to Buffalo for deposition of client	3.00	1,650.00
07/17/2012	BLB	Multiple email correspondence with defense counsel re discovery	0.30	165.00
07/18/2012	BLB	Deposition attendance -- deposition of client in Buffalo (2.0 hours) & travel back to NYC (3.0 hours)	5.00	2,750.00
08/13/2012	BLB	Analysis and review of papers received in opposition to motion for class certification with Ken Hiller (0.2) and then Seth Andrews (0.7); drafted email letter with Seth Andrews re public filing of personal information on ECF by Connie Montoya	0.90	495.00
08/13/2012	BLB	Email correspondence with defense counsel re need to correct e-filing of confidential information	0.10	55.00
08/14/2012	BLB	Read and reviewed email from defense counsel re confidential information removed from the docket	0.10	55.00
08/19/2012	BLB	Read, reviewed, and analyzed Defendants' discovery responses	1.20	660.00
08/28/2012	MNL	Analysis and review of reply brief	0.50	200.00

08/29/2012	MNL	Preparation of reply brief, Seth Andrews declaration, and notice of motion	3.80	1,520.00
08/29/2012	BLB	Telephone call w/ Connie Montoya and Ken Hiller re defendants' discovery responses	0.70	385.00
11/19/2012	BLB	Research of net-worth discovery issues for reply brief -- found six cases	0.50	275.00
11/20/2012	BLB	Preparation of reply brief on motion to compel discovery	3.70	2,035.00
11/21/2012	BLB	Final preparation of Reply Brief in Further Support of Motion to Compel and review of co-counsel's Reply Affirmation	2.90	1,595.00
11/28/2012	BLB	Preparation of discovery responses	3.30	1,815.00
09/26/2013	BLB	Research of model protective orders from Judge Forrest -- comparison to Connie Montoya's proposed protective order -- preparation of email to Connie Montoya re protective orders	0.60	330.00
10/04/2013	JRM	Draft of motion and memorandum to preclude/enter protective order/impose sanctions	1.90	760.00
10/07/2013	JRM	Draft of motion and memorandum to preclude/enter protective order/impose sanctions	2.30	920.00
10/07/2013	JRM	Draft of motion and memorandum to preclude/enter protective order/impose sanctions	5.10	2,040.00
10/08/2013	JRM	Preparation of Motion for Sanctions/Protective Order for filing	1.30	520.00
10/21/2013	JRM	Draft, revise and edit of reply in support of motion for sanctions	4.50	1,800.00
10/22/2013	BLB	Preparation of reply declaration on motion for sanctions	1.50	825.00
10/24/2013	BLB	Preparation of motion for stay of briefing on motion for summary judgment pending close of discovery	4.20	2,310.00
10/25/2013	JRM	Draft, revise and edit of motion to stay summary judgment	5.00	2,000.00
10/29/2013	BLB	Preparation of Second Set of Discovery Demands	1.70	935.00
11/05/2013	JRM	Draft, revise and edit of reply on motion to stay sum judge briefing	2.50	1,000.00
11/05/2013	JRM	Read and review Opposition to Expedited Motion to stay briefing on sum judg	0.80	320.00
11/30/2013	BLB	Research of case law concerning g-violation alleged in the complaint -- found more than a dozen cases in favor of plaintiff	2.50	1,375.00
12/01/2013	BLB	Research of case law re active debt collector v passive debt buyer nonsense claimed by defendants	0.50	275.00
12/04/2013	BLB	Telephone call to Connie Montoya -- left voicemail at about 6:38 pm	0.10	No Charge
12/04/2013	BLB	Telephone call w/ Seth Andrews to Connie Montoya to confer re her clients' responses to the Second Set of Discovery Demands -- left voicemail at 10:39 a.m.	0.10	No Charge
12/04/2013	BLB	Telephone call -- left voicemail -- around 4:00 p.m.	0.10	No Charge
12/05/2013	BLB	Email correspondence with co-counsel re protective order	0.10	No Charge
12/05/2013	BLB	Telephone call re discovery with Connie Montoya, Nabil Foster, and JRM	0.70	No Charge
12/05/2013	BLB	Preparation of protective order using Judge Forrest's "Model Protective Order 2"; transmission by email to Connie Montoya	0.50	No Charge
12/05/2013	JRM	Telephone call with Brian Bromberg, Concepcion Montoya, Nabil Foster - conferring over discovery responses	0.70	No Charge
12/07/2013	BLB	Preparation of motion to extend discovery	2.50	1,375.00
12/09/2013	JRM	Draft of motion and memorandum for extension of discovery and all deadlines	4.00	1,600.00
12/09/2013	JRM	Read and review draft of motion to extend discovery	0.20	80.00
12/13/2013	BLB	Godson -- BLB and JRM -- Follow-Up Call with Nabil Foster re LVNV production -- Connie Montoya was not available	1.20	No Charge
12/13/2013	JRM	Godson - Follow-up phone call with Brian & Nabil Foster re: LVNV production - Connie Montoya not available	1.20	No Charge

12/17/2013	JRM	Draft, revise and edit of second motion to compel	4.00	No Charge
12/18/2013	JRM	Draft, revise and edit of second motion to compel	4.00	No Charge
12/23/2013	BLB	Read and reviewed papers filed by Connie Montoya	0.50	275.00
12/23/2013	BLB	Email correspondence with co-counsel re papers filed by Connie Montoya	0.10	55.00
12/26/2013	JRM	Draft, revise and edit of reply on motion to extend discovery and all deadlines	3.00	1,200.00
12/27/2013	JRM	Draft, revise and edit of reply on motion for extension of discovery and all deadlines	3.00	1,200.00
12/30/2013	JRM	Draft, revise and edit of reply on motion for extension of discovery and all deadlines; draft and edit accompanying motion to seal; filing of motions by ECF and mail.	12.00	4,800.00
01/02/2014	JRM	Draft, revise and edit of second motion to compel	5.00	No Charge
01/07/2014	JRM	Draft, revise and edit of second motion to compel	9.50	No Charge
01/08/2014	JRM	Draft, revise and edit of second motion to compel	2.00	No Charge
01/08/2014	JRM	Draft, revise and edit of second motion to compel	8.20	No Charge
01/09/2014	JRM	Draft, revise and edit of second motion to compel	2.70	No Charge
01/09/2014	JRM	Draft, revise and edit of second motion to compel	5.50	No Charge
01/10/2014	BLB	Final preparation of motion papers, including all supporting documents	3.20	No Charge
01/10/2014	BLB	Preparation of revised memorandum in support of second motion to compel discovery responses	0.80	No Charge
01/10/2014	BLB	Preparation of Second Motion to Compel	0.50	No Charge
01/10/2014	JRM	Draft, revise and edit of second motion to compel	3.00	No Charge
01/10/2014	JRM	Final preparation of motion papers, including all supporting documents	5.00	No Charge
01/13/2014	BLB	Email correspondence with co-counsel re pending motions	0.10	55.00
01/17/2014	JRM	Draft, revise and edit of letter to C. Montoya re: objections to confidentiality designations	0.60	240.00
01/17/2014	JRM	Telephone call w/ Consulting CPA re: EEC's audited financial statements and tax returns	0.40	160.00
01/20/2014	JRM	Draft, revise and edit of letter contesting confidential designations	1.70	680.00
01/21/2014	JRM	Research of standard for confidentiality in 2d Cir.	2.20	880.00
01/22/2014	JRM	Draft, revise and edit of letter requesting removal of confidential designation	4.00	1,600.00
01/23/2014	JRM	Draft, revise and edit of letter to Ms. Montoya requesting removal of confidentiality designations; Preparation of letter re: confidentiality designations for service	4.80	1,920.00
01/23/2014	BLB	Read and reviewed email from JRM to Connie Montoya re removing confidential designations	0.30	165.00
01/30/2014	JRM	Draft, revise and edit of letter responding to Connie Montoya's request for additional time to oppose 2nd Motion to compel	1.20	480.00
01/31/2014	BLB	Read and reviewed letter from Connie Montoya re removing confidentiality designations	0.20	110.00
02/01/2014	BLB	Read and reviewed Hunsinger discovery decision from Texas; corresponded with co-counsel about its application to this case	0.20	110.00
02/01/2014	BLB	Email correspondence with co-counsel re Defendants' confidentiality designations and letter from Connie Montoya	0.20	110.00
02/06/2014	JRM	Analysis and review of letter to Ms. Montoya requesting voluntary removal of confidentiality designations	0.50	200.00
02/07/2014	BLB	Read and reviewed email re supplemental document production received from Connie Montoya	0.20	110.00
02/07/2014	BLB	Read and reviewed opposition to motion to compel and cross-motion to bifurcate e-filed by Defendants; email correspondence to co-counsel	0.50	275.00
02/10/2014	BLB	Research of cases involving the type of trade-secret claims	0.50	275.00

		raised by defense counsel		
02/14/2014	BLB	Read and reviewed Defendants' complete opposition and cross-motion papers	1.00	550.00
02/20/2014	JRM	Draft, revise and edit of reply on Second Motion to Compel	6.20	No Charge
02/21/2014	JRM	Draft, revise and edit of motion for extension of time to reply, after we realized Connie Montoya's opposition papers were incomplete	0.40	No Charge
02/21/2014	JRM	E-mail to Connie Montoya after we realized her opposition papers were incomplete	0.30	No Charge
02/26/2014	JRM	Draft, revise and edit of Bromberg Reply Decl - 2nd Motion to Compel	2.00	No Charge
02/26/2014	BLB	Final preparation with JRM of reply papers on motion to compel and opposition papers on motion to bifurcate	5.00	No Charge
02/26/2014	JRM	Research of Reply Memo on 2nd motion to compel (searching for and marking unsupported assertions of fact in Opposition Memo)	2.00	No Charge
02/26/2014	JRM	Research of law on bifurcation of discovery	0.90	No Charge
02/26/2014	JRM	Draft, revise and edit of reply memo on 2nd motion to compel	3.00	No Charge
02/26/2014	JRM	Draft, revise and edit of reply memo - 2nd motion to compel (editing)	1.00	No Charge
02/26/2014	JRM	Draft, revise and edit of opposition to motion to bifurcate	1.20	No Charge
02/26/2014	JRM	Draft, revise and edit of notice of motion to seal & proposed order	1.10	No Charge
02/26/2014	JRM	Preparation of 2nd Motion to Compel, Opp to Motion to Bifurcate, and motion to seal: Printing, sorting, and mailing all documents; e-filing of notice of motion to seal	3.80	No Charge
03/04/2014	BLB	Email correspondence with co-counsel re reply brief	0.10	55.00
03/20/2014	JRM	Draft, revise and edit of motion to remove confidentiality designations/unseal	0.90	360.00
03/20/2014	BLB	Email correspondence with Connie Montoya (2x) re documents filed by the Court under seal	0.20	110.00
05/08/2014	BLB	Preparation of Notice of Supplemental Authority re Hallmark decision	0.50	275.00
06/12/2014	BLB	Research on PACER re the Cox v. Sherman case -- downloaded dozens of files	2.30	1,265.00
07/03/2014	JRM	Draft of motion and memorandum: Motion to strike confidentiality designations and to unseal filed documents	2.00	800.00
07/03/2014	JRM	Read and review case file; reviewing discovery produced by defendants, what defendants marked as confidential, and what discovery Plaintiff still requires	1.60	640.00
09/15/2014	JRM	Read and review MJ Schroeder's Decision and Order, ECF#103	0.80	No Charge
09/29/2014	JRM	Attend meeting with BLB regarding strategy - filing objections to M.J. Schroeder's recent decision and order	0.60	No Charge
09/29/2014	JRM	Draft, revise and edit of objections to M.J. Schroeder's recent discovery and scheduling order	9.30	No Charge
09/29/2014	BLB	Attend meeting w/ JRM re objections to Magistrate Schroeder's discovery order	0.60	No Charge
09/29/2014	BLB	Preparation of objections to Decision and Order	1.50	No Charge
09/29/2014	BLB	Research of developments in Cox case in S.D. Indiana	1.80	No Charge
09/29/2014	JRM	Read and review M.J. Schroeder's Decision and Order, previous briefs and exhibits in preparation for drafting objections to Decision and Order.	2.00	No Charge
10/06/2014	JRM	Read and review of discovery materials recently turned over by defendants	1.30	No Charge
10/07/2014	JRM	Draft, revise and edit of Motion for Reconsideration/Motion for Contempt filed with MJ Schroeder	3.00	No Charge
10/08/2014	JRM	Draft, revise and edit of motion for reconsideration	6.20	No Charge
10/09/2014	JRM	Draft, revise and edit of motion for reconsideration	9.10	No Charge

10/10/2014	JRM	Draft, revise and edit of Motion for Reconsideration	5.10	No Charge
10/13/2014	JRM	Draft, revise and edit of Motion for Reconsideration	9.10	No Charge
10/14/2014	JRM	Draft, revise and edit of footnotes in Memorandum in support of Motion for Reconsideration	0.60	No Charge
10/14/2014	BLB	Preparation of motion for reconsideration of Decision & Order, dated September 15, 2014	4.80	No Charge
10/14/2014	JRM	Draft, revise and edit of Miller Declaration in support of Motion for Reconsideration	1.90	No Charge
10/14/2014	JRM	Draft, revise and edit of Motion for Reconsideration	9.30	No Charge
10/14/2014	JRM	Preparation of Motion for Reconsideration for filing under seal	2.00	No Charge
10/17/2014	BLB	Telephone call w/ Consulting CPA and JRM re LVNV's financials	0.30	No Charge
10/20/2014	JRM	Preparation of outline - new Motion for Contempt (LVNV's failure to comply with Sept. 15 order)	2.00	No Charge
10/20/2014	JRM	Draft, revise and edit of Motion for Contempt/Sanctions	0.10	No Charge
10/20/2014	JRM	Draft, revise and edit of Motion for Contempt/Sanctions	2.40	No Charge
10/20/2014	JRM	Research of law on civil contempt	1.10	No Charge
10/22/2014	JRM	Draft, revise and edit of Motion for Sanctions/Contempt	3.00	No Charge
10/23/2014	JRM	Draft, revise and edit of Motion for Contempt/Sanctions	10.10	No Charge
10/24/2014	JRM	Draft, revise and edit of Bromberg Decl. In support of motion for Sanctions	0.60	No Charge
10/24/2014	BLB	Preparation of motion for sanctions and contempt and supporting papers	3.20	No Charge
10/24/2014	JRM	Draft, revise and edit of Notice of Motion for Sanctions	0.30	No Charge
10/24/2014	JRM	Draft, revise and edit of Notice of Motion to Seal	0.30	No Charge
10/24/2014	JRM	Draft, revise and edit of Memo in support of Motion for Sanctions/Contempt (proofreading, section on contempt, footnotes)	3.00	No Charge
10/24/2014	JRM	Preparation of Notice of motion for Sanctions and Notice of Motion to Seal for electronic filing, plus Memo, Declaration, and exhibits for papers filing	3.20	No Charge
10/24/2014	JRM	Draft, revise and edit of Motion for Contempt/Sanctions	4.60	No Charge
11/11/2014	BLB	Email correspondence with Connie Montoya	0.10	55.00
11/12/2014	BLB	Read and reviewed email correspondence from Connie Montoya	0.10	55.00
11/20/2014	BLB	Read and reviewed email correspondence from Connie Montoya	0.10	55.00
11/20/2014	BLB	Email correspondence with Connie Montoya	0.10	55.00
11/20/2014	BLB	Email correspondence with Connie Montoya	0.10	55.00
11/20/2014	BLB	Read and reviewed email correspondence from Connie Montoya	0.10	55.00
11/21/2014	BLB	Email correspondence with Connie Montoya	0.10	55.00
10/02/2015	JRM	Analysis and review of Magistrate Judge Schroeder's September 30 discovery order	0.90	360.00
10/02/2015	BLB	Email correspondence with Connie Montoya, attaching a copy of Decision and Order, Document No. 137	0.10	55.00
10/02/2015	BLB	Analysis and review of Magistrate Judge Schroeder's Decision and Order	0.70	385.00
10/05/2015	JRM	Analysis and review of case file, previous discovery orders, and discovery produced by Defendants, in preparation for deciding whether to object to Magistrate Judge Schroeder's order	1.40	560.00
10/07/2015	JRM	Telephone call w/ Connie Montoya and co-counsel	0.20	80.00
10/07/2015	JRM	Telephone call w/ co-counsel re settlement issues and whether to object to 10% of Magistrate Schroeder's Decision and Order	0.50	200.00
10/07/2015	BLB	Telephone call w/ co-counsel re settlement issues and	0.50	275.00

		whether to object to 10% of Magistrate Schroeder's Decision and Order		
10/07/2015	BLB	Telephone call w/ Connie Montoya and co-counsel	0.20	110.00
10/09/2015	JRM	Telephone call w/ client and Seth Andrews and BLB re case status and formulating a settlement demand	0.50	200.00
10/09/2015	JRM	Analysis and review of Cox v. Sherman docket to see if there have been any new developments, especially whether any depositions had been taken	1.40	560.00
10/09/2015	BLB	Telephone call w/ client and Seth Andrews and JRM re case status and formulating a settlement demand	0.50	275.00
10/12/2015	JRM	Preparation for service of subpoena on Plews Shadley for deposition transcripts	1.00	400.00
10/12/2015	BLB	Email correspondence with defense counsel re settlement after circulating draft to co-counsel; read and reviewed email back from Connie Montoya	0.40	220.00
11/02/2015	JRM	Telephone call w/ Connie Montoya, Nabil Foster, and BLB re deposition transcripts and exhibits1;	0.20	80.00
11/02/2015	BLB	Telephone call w/ Connie Montoya, Nabil Foster, and JRM re deposition transcripts and exhibits1	0.20	110.00
11/06/2015	JRM	Draft, revise and edit of response to LVNV's Objections to MJ Schroeder's Order	1.90	760.00
11/06/2015	JRM	Analysis and review of LVNV's motion to quash subpoena on Plews Shadley	0.60	240.00
11/06/2015	JRM	Analysis and review of new discovery produced by LVNV	1.00	No Charge
11/09/2015	JRM	Draft, revise and edit of response to LVNV's Objections to MJ Schroeder's Order	8.50	3,400.00
11/09/2015	JRM	Preparation of responses to LVNV's Objections and all supporting documents for filing	1.00	400.00
11/09/2015	BLB	Preparation of revised response to LVNV's objections	0.90	495.00
11/09/2015	JRM	Correspondence with opposing counsel re deficient discovery responses (x2)	0.80	No Charge
11/13/2015	JRM	Analysis and review of discovery newly produced by LVNV (servicing agreement)	0.60	No Charge
11/15/2015	JRM	Analysis and review of discovery newly produced by LVNV - declaration regarding finances	0.10	No Charge
11/15/2015	JRM	Correspondence with opposing counsel re deficient discovery responses	0.30	No Charge
11/16/2015	JRM	Analysis and review of discovery newly produced by LVNV (operating agreement)	0.60	No Charge
11/16/2015	JRM	Correspondence with opposing counsel re: deficient discovery responses	0.80	No Charge
11/17/2015	JRM	Correspondence with opposing counsel re: deficient discovery responses	0.80	No Charge
11/20/2015	JRM	Draft, revise and edit of memo in opposition to LVNV's motion to quash	12.10	4,840.00
11/20/2015	JRM	Draft, revise and edit of Bromberg Decl in opposition to LVNV motion to quash	1.50	600.00
11/20/2015	JRM	Preparation of all documents and exhibits - Plaintiff's opposition to LVNV's motion to quash in Indiana	2.70	1,080.00
11/24/2015	BLB	Read and reviewed email correspondence from Pushpa Piyatissa re withdrawal	0.10	55.00
12/04/2015	JRM	Analysis and review of LVNV's reply - motion to quash subpoena on Cox depo	0.30	120.00
12/28/2015	JRM	Correspondence with Connie Montoya and Nabil Foster - deadlines for producing discovery	0.50	No Charge
01/18/2016	JRM	Draft, revise and edit of Motion for Contempt/Sanctions against LVNV	4.00	No Charge
01/18/2016	JRM	Read and review of all materials relevant to drafting motion for contempt/sanctions against LVNV: previous discovery orders, discovery produced by defendants; emails between counsel, notes, etc.	2.00	No Charge

01/21/2016	JRM	Draft, revise and edit of Fourth Motion for Contempt/Sanctions against LVNV	1.90	No Charge
01/26/2016	JRM	Draft, revise and edit of 4th motion for sanctions/contempt against LVNV	3.10	No Charge
01/27/2016	JRM	Draft, revise and edit of fourth motion for contempt/sanctions against LVNV	1.90	No Charge
01/28/2016	JRM	Draft, revise and edit of fourth motion for contempt/sanctions against LVNV	5.00	No Charge
01/28/2016	JRM	Research of Cox docket - analyzing and downloading materials added to electronic docket since late November	1.00	No Charge
01/29/2016	JRM	Draft, revise and edit of fourth motion for sanctions/contempt against LVNV	3.80	No Charge
02/01/2016	JRM	Draft, revise and edit of Miller Decl in support of contempt/sanctions against LVNV, with some preparation of exhibits	2.50	No Charge
02/01/2016	BLB	Preparation of revised memorandum	1.10	No Charge
02/01/2016	JRM	Research of whether withdrawal of summary judgment motion constitutes waiver of issue for purposes of trial	0.30	No Charge
02/01/2016	JRM	Research of who has burden of demonstrating defendant is "debt collector"	0.20	No Charge
02/01/2016	JRM	Draft, revise and edit of memo in support of contempt/sanctions against LVNV - fixing footnotes; revising; section on legal standard	4.10	No Charge
02/05/2016	JRM	Draft, revise and edit of Motion to Extend All Discovery Deadlines (due to LVNV not producing discovery), as well as declaration in support of Motion	2.10	No Charge
02/05/2016	JRM	Preparation of - Final prep and filing of Motion to extend discovery deadlines (because of LVNV's failure to provide discovery)	0.90	No Charge
02/23/2016	JRM	Read and review LVNV's Opposition to Fourth Motion for Sanctions	1.00	No Charge
03/04/2016	JRM	Analysis and review of account notes produced by LVNV - trying to determine exactly how LVNV calculated interest, which is relevant to whether debt purchase documents are relevant to this case - in preparation for reply brief on fourth motion for sanctions	2.80	No Charge
03/04/2016	JRM	Draft, revise and edit of reply memorandum - fourth motion for sanctions	5.30	No Charge
03/07/2016	JRM	Draft, revise and edit of Miller reply declaration in further support of fourth motion for sanctions	3.20	No Charge
03/07/2016	BLB	Final review of reply papers and motion to seal	0.50	No Charge
03/07/2016	BLB	Preparation of revised reply memorandum	1.20	No Charge
03/07/2016	JRM	Draft, revise and edit of reply memo in further support of fourth motion for sanctions; proofreading, adding and fixing footnotes	1.40	No Charge
03/07/2016	JRM	Preparation of reply papers in further support of fourth motion to seal and filing, including preparation of motion to seal Miller Decl.	1.10	No Charge
03/08/2016	JRM	Analysis and review of MJ Lynch's decision quashing subpoena (S.D. Indiana)	1.20	480.00
03/11/2016	JRM	Research of cases cited in MJ Lynch's decision (S.D. Indiana)	1.80	720.00
03/17/2016	JRM	Research of 7th Circuit case law on stipulated protective orders and confidentiality - in preparation for objections to MJ Lynch's decision quashing subpoena (S.D. Indiana)	6.40	2,560.00
03/17/2016	JRM	Draft, revise and edit of outline for objections to MJ Lynch's decision quashing subpoena (SD Indiana)	1.00	400.00
03/18/2016	JRM	Draft, revise and edit of objections to MJ Lynch's decision quashing subpoena (SD Indiana)	8.10	3,240.00
03/18/2016	JRM	Preparation of and filing objections to MJ Lynch's decision (S.D. Indiana)	1.10	440.00

03/23/2016	JRM	Draft, revise and edit of motion to stay objections to MJ Lynch's order, while Motion for Reconsideration is pending	1.40	560.00
03/23/2016	JRM	Preparation of and filing of motion to stay (S.D. Indiana)	0.50	200.00
03/24/2016	JRM	Read and review LVNV's sur-reply in opposition to Fourth Motion for Sanctions	0.60	No Charge
03/24/2016	JRM	Research of Florida law on judgments and statutory interest	0.90	No Charge
03/25/2016	JRM	Draft, revise and edit of motion to file sur-sur-reply as well as motion for leave to file sur-sur-reply	6.10	No Charge
03/25/2016	JRM	Preparation of motion for leave to file sur-sur-reply and proposed sur-sur-reply and filing	0.40	No Charge
04/01/2016	JRM	Research of 7th Circuit law on confidentiality and intervention in preparation for filing Motion for Reconsideration (SD Indiana)	2.20	880.00
04/04/2016	JRM	Preparation of and filing of Motion for Reconsideration (S.D. Indiana)	2.10	840.00
04/04/2016	JRM	Draft, revise and edit of Motion for Reconsideration	9.20	3,680.00
04/05/2016	BLB	Final preparation and service of cover letter and Third Set of Written Discovery Demands	1.00	550.00
04/05/2016	BLB	Correspondence with Amy Romig re document preservation	0.60	330.00
04/06/2016	JRM	Draft, revise and edit of and filing Motion to Intervene (total time 1 hr, split with Moukengeschaie case).	0.50	200.00
04/07/2016	JRM	Draft, revise and edit of brief in support of motion to intervene in Cox (total time 2.2, split with Moukengeschaie)	1.10	440.00
04/07/2016	JRM	Preparation of and filing of Bromberg decl in support of Cox motion to intervene, and filing (.8 total, split with Moukengeschaie case)	0.40	160.00
04/07/2016	JRM	Preparation of exhibits to Bromberg decl in support of motion to intervene in cox (total time 3.2 hrs, split with Moukengeschaie case)	1.60	640.00
04/07/2016	JRM	Draft, revise and edit of Bromberg declaration in support of motion to intervene in Cox (total time 1.2, split with Moukengeschaie)	0.60	240.00
04/08/2016	JRM	Preparation of and filing of brief in support of motion to intervene in Cox (total time .8, split with Moukengeschaie)	0.40	160.00
04/08/2016	JRM	Draft, revise and edit of brief in support of motion to intervene in Cox (total time 6.4, split with Moukengeschaie)	3.20	1,280.00
04/10/2016	BLB	Final preparation and service of motion to intervene and unseal	7.50	4,125.00
04/19/2016	JRM	Read and review of LVNV's Opposition to Motion for Reconsideration (SD Indiana)	1.00	400.00
04/21/2016	JRM	Research of cases cited in LVNV's Opp to our Motion for Reconsideration (SD Indiana)	1.30	520.00
04/22/2016	JRM	Preparation of and filing of Reply on Motion for Reconsideration (SD Indiana)	1.90	760.00
04/29/2016	JRM	Draft, revise and edit of reply on Motion for Reconsideration (SD Indiana)	5.50	2,200.00
05/18/2016	BLB	Attend meeting w/ Connie Montoya -- discussed settling attorney fees at courthouse	0.10	55.00
05/19/2016	BLB	Email correspondence with Connie Montoya re resolving attorney fees issue	0.30	165.00
05/19/2016	BLB	Email correspondence with Nabil Foster re his firm still sending documents to my old address	0.10	55.00
05/19/2016	BLB	Read and reviewed purchase and sale agreement with an eye to moving to preclude and for sanctions and with an eye to depositions	0.50	275.00
05/19/2016	JRM	Draft, revise and edit of Fifth Motion for Sanctions - outlining and introduction	3.00	1,200.00
05/20/2016	JRM	Draft, revise and edit of Fifth Motion for Sanctions - Part I (includes research and collecting exhibits re: Sherman entities and predictive analytics of debt buying)	5.00	2,000.00
05/27/2016	BLB	Preparation of revised papers in opposition to motion for	0.80	440.00

		protective order		
06/06/2016	BLB	Read and reviewed email from Nabil Foster; email correspondence back and forth	0.30	165.00
07/11/2016	JRM	Read and review LVNV's Opposition to our Fifth Motion for Sanctions	0.50	200.00
07/11/2016	JRM	Draft, revise and edit of reply on Fifth Motion for Sanction against LVNV - preparation of outline	0.10	40.00
07/11/2016	JRM	Read and review of LVNV's reply memo on its motion for protective order	0.30	120.00
07/11/2016	JRM	Draft, revise and edit of reply on Fifth Motion to Sanction LVNV - section on "transfer" versus "business deal"	2.00	800.00
07/13/2016	JRM	Draft, revise and edit of reply on fifth motion for sanctions - section A on "business deal" docs	4.00	1,600.00
07/14/2016	JRM	Draft, revise and edit of reply on fifth motion for sanctions - sections B & C	4.50	1,800.00
07/14/2016	BLB	Preparation of revised reply brief	0.50	275.00
07/15/2016	JRM	Draft, revise and edit of Miller Reply Decl - fifth motion for sanctions	0.30	120.00
07/15/2016	JRM	Draft, revise and edit of reply memo - fifth motion for sanctions - cutting down to page limit	0.50	200.00
07/15/2016	JRM	Preparation of - final prep of reply memo, reply decl, and certificate of service and filing	1.10	440.00
01/18/2017	BLB	Telephone call w/ JRM and Seth Andrews re discovery and deposition issues	0.40	220.00
03/10/2017	BLB	Telephone call w/ RJM and Montoya and Nabil and two or three other associates	0.30	165.00
03/10/2017	BLB	Telephone call w/ JRM re jiggering our 30(b)(6) topics	0.10	55.00
03/10/2017	JRM	Telephone call with all counsel re: deposition topics and timing	0.30	120.00
03/10/2017	JRM	Telephone call with BLB re: necessity of revising deposition topics	0.10	40.00
05/19/2017	BLB	Telephone call w/ Connie and Nabil re revised deposition notices	0.30	165.00
06/23/2017	BLB	Telephone call w/ Connie Montoya re rescheduling Eltman 30(b)(6) deposition	0.10	55.00
06/27/2017	BLB	Telephone call w/ Nabil Foster and co-counsel re scheduling	0.50	275.00
06/27/2017	BLB	Preparation of motion to extend discovery because of extraordinary circumstances	0.60	330.00
06/28/2017	BLB	Final preparation and filing of Godson motion to extend deadlines	0.60	330.00
06/29/2017	BLB	Telephone call w/ JRM re proposed dates for rescheduled Eltman deposition	0.30	165.00
07/06/2017	BLB	Telephone call w/ JRM re Nabil's proposed deposition dates for LVNV	0.30	165.00
07/18/2017	BLB	Final preparation and service of Amended Deposition Notices	1.20	660.00
07/20/2017	BLB	Preparation for taking deposition	5.20	2,860.00
07/21/2017	BLB	Final preparation for deposition of Eltman with JRM	1.10	605.00
07/21/2017	BLB	Deposition under Rule 30(b)(6) of Eltman (jacquelyn Kenel)	8.70	4,785.00
07/25/2017	BLB	Preparation with JRM for taking deposition of LVNV	0.60	330.00
07/25/2017	BLB	Reviewed all court documents to see whether there was anything we might have missed that we would want to mark as a deposition exhibit	2.60	1,430.00
07/26/2017	BLB	Travel time from Manhattan to LaGuardia to Charlotte to Greenville (by car) for deposition	7.00	3,850.00
07/27/2017	BLB	Final preparation for LVNV deposition with JRM	1.10	605.00
07/27/2017	BLB	Deposition under Rule 30(b)(6) of LVNV (Meghan Emmerich)	7.00	3,850.00
07/28/2017	BLB	Telephone call w/ JRM and Connie Montoya re discovery	0.40	220.00

		and motion practice and settlement		
07/28/2017	BLB	Travel time from Greenville to Charlotte (by car) to LGA to Manhattan	7.00	3,850.00
07/31/2017	BLB	Telephone call w/ Chris Godson re case status and settlement	0.30	165.00
08/29/2017	BLB	Service of subpoena on Eltman's accountants	1.00	550.00
08/30/2017	BLB	Telephone call w/ Angela Stokes re deposition	0.10	55.00
09/14/2017	BLB	Travel time from Manhattan to JFK to Raleigh for deposition of Angela Stokes	4.50	2,475.00
09/14/2017	BLB	Telephone call w/ JRM -- preparation for Stokes deposition	1.20	660.00
09/15/2017	BLB	Travel time from Raleigh to JFK to Manhattan	4.50	2,475.00
09/15/2017	BLB	Final preparation with JRM for Stokes deposition	0.80	440.00
09/15/2017	BLB	Deposition of Angela Stokes	6.60	3,630.00
09/19/2017	BLB	Telephone call w/ court reporter and JRM -- made record of non-attendance of EEC's accountants	0.30	165.00
09/26/2017	BLB	Telephone call w/ Nabil Foster and JRM re settlement	0.30	165.00
09/27/2017	BLB	Email correspondence with client re Defendants' settlement offer	0.40	220.00
10/24/2017	BLB	Telephone call w/ JRM re what needs to be done next on this case and what the DebtNext database shows	1.20	660.00
11/02/2017	BLB	Telephone call w/ Chris Godson and JRM -- client authorized us to demand \$800 a class member + money to him + money to us	0.20	110.00
11/02/2017	BLB	Telephone call w/ Nabil Foster and JRM -- conveyed new settlement demand	0.20	110.00
11/06/2017	BLB	Travel time to Buffalo from NYC, including trip to airport	3.00	1,650.00
11/06/2017	BLB	Attend meeting w/ Seth and client to prepare for mediation	1.00	550.00
11/07/2017	BLB	Attend meeting -- settlement conference in Buffalo and putting settlement terms on the record	7.00	3,850.00
11/14/2017	BLB	Telephone call w/ JRM and Rebecca Gelozin	0.20	110.00
11/21/2017	BLB	Telephone call w/ Wilson Elser re pending motion for contempt	0.10	55.00
11/21/2017	BLB	Email correspondence with JRM re call with Wilson Elser and how to proceed with pending motion	0.10	55.00
12/12/2017	BLB	Preparation of first draft of settlement documents	1.50	825.00
01/04/2018	BLB	Email correspondence with Nabil and Connie re settlement documents -- where are they?	0.20	110.00
02/02/2018	BLB	Preparation of revised settlement documents; email to defense counsel	0.50	275.00
04/02/2018	BLB	Preparation of declaration in support of preliminary approval	1.50	825.00
04/23/2018	BLB	Telephone call w/ Chambers -- Court needs courtesy copies	0.10	55.00
04/23/2018	BLB	Research of court rules and individual practices	0.20	110.00
04/23/2018	BLB	Telephone call w/ Chambers	0.10	55.00
04/23/2018	BLB	Preparation of courtesy copies and preparation of corrected memorandum	1.90	1,045.00
05/04/2018	BLB	Court, preparation for and attendance at Preliminary Fairness Hearing in Buffalo	7.00	3,850.00
05/18/2018	BLB	Telephone call w/ Connie Montoya re revisions to preliminary approval papers	0.30	165.00
05/18/2018	BLB	Preparation of revised preliminary approval papers	0.40	220.00
05/18/2018	BLB	Final preparation of revised preliminary approval order and settlement notice; transmission to Judge Wolford	0.70	385.00
05/23/2018	BLB	Email correspondence with defense counsel re getting out class notice	0.10	55.00
05/31/2018	BLB	Preparation -- final review and approval of class settlement notice	0.40	220.00
09/14/2018	BLB	Preparation of Memorandum in Support of Final Approval	6.80	3,740.00

09/15/2018	BLB	Preparation of final approval papers	5.30	2,915.00
09/17/2018	BLB	Preparation of Bromberg Declaration in Support of Final Approval and Exhibits	5.10	2,805.00
09/20/2018	BLB	Preparation of Final Approval Papers	6.10	3,355.00
Total Fees			657.90	\$194,105.00

Expenses

03/16/2012	E110 Out-of-town travel -- flights to/from Buffalo for mediation conference	269.60
03/30/2012	E110 Out-of-town travel -- taxi to airport	59.30
05/04/2012	E110 Out-of-town travel -- JetBlue flight to/from Buffalo	189.80
05/11/2012	Hampton Inn in Buffalo for May 19, 2012 mediation conference	193.49
05/18/2012	E110 Out-of-town travel -- taxi to airport	60.36
06/13/2012	E108 Postage -- Federal Express	16.99
06/13/2012	E108 Postage -- Federal Express	16.99
07/19/2012	E110 Out-of-town travel -- Parking at JFK Lot	42.00
01/10/2014	E108 Postage -- Federal Express	70.13
11/18/2014	E119 Experts -- Expert Fees paid to Consulting CPA -- \$1,137.50 (zeroed out because already resolved as part of a court-awarded sanction)	0.00
11/09/2015	E113 Subpoena fees -- cost to serve subpoena duces tecum in Indianapolis -- used Guaranteed Subpoena Service, Inc.	129.95
04/13/2016	E108 Postage -- Federal Express	234.93
07/16/2017	E110 Out-of-town travel -- American Airlines from NYC to Charlotte and Back	267.90
07/26/2017	E115 Deposition transcripts -- Eltman -- payment to Esquire Solutions -- Invoice No. 1037821	3,080.75
07/28/2017	E110 Out-of-town travel -- Alamo Car Rental	168.34
07/28/2017	E110 Out-of-town travel -- gas for rental car to get to-from Greenville from Charlotte	16.50
07/28/2017	E110 Out-of-town travel -- Hampton Inn in Greenville	327.08
08/28/2017	E113 Subpoena fees -- PKF O'Connor Davies LLP	70.00
10/12/2017	E115 Deposition transcripts -- Angela Stokes Deposition	865.00
10/13/2017	E115 Deposition transcripts -- Emmerich Deposition -- payment to Compuscripts, Inc., Inv. No. 1040476	2,361.04
10/16/2017	E115 Deposition transcript -- Eltman's accountants -- payment to Esquire Solutions -- Invoice No. 1081060	344.31
10/18/2017	E119 Experts -- fee paid to a consulting CPA	570.00
11/07/2017	Hotel -- The Mansion on Delaware Avenue	255.94
12/17/2017	E115 Deposition transcripts -- videographer -- deposition of Angela Stokes	496.50
04/23/2018	E110 Out-of-town travel -- JetBlue to/from Buffalo for Preliminary Approval Hearing	310.39
05/04/2018	E110 Out-of-town travel -- airport taxi in Buffalo	39.96
05/04/2018	E110 Out-of-town travel -- Jerusalem Car Service to airport	35.00
05/04/2018	E110 Out-of-town travel -- taxi from airport to home	51.52
05/04/2018	E110 Out-of-town travel -- taxi from court to airport	17.32
09/05/2018	E110 Out-of-town travel -- Delta to/from Buffalo for Final Approval Hearing	210.40

09/16/2018 E110 Out-of-town travel -- Hotel Room for Final 256.28
Approval Hearing

Total Expenses

\$11,027.77

TOTAL NEW CHARGES

\$205,132.77

STATEMENT OF ACCOUNT

Current Fees (Amounts marked "No Charge" above were
resolved through Sanction Payments)
Current Expenses

194,105.00

11,027.77

AMOUNT DUE AND OWING TO DATE

\$205,132.77

PER: _____

Brian L. Bromberg